Case 2:07-cv-06379-RMB Document 7 DATE FILED: DOC #: LAW OFFICES OF GEORGE B. FREEHILL FREEHILL HOGAN & MNORTHLENTY WILLIAM L. JUSKA, JR. 80 PINE STREET JAMES L ROSS\* DOCIMENT ERIC E. LENCK FW YORK, N.Y. 10005-1759 623.5514 JOHN J. WALSH 23-3813 MO ENDORSI TIZECZDNA PATRICK J. BONNER\* ELEPHONE (212) 425-1900 PETER J. GUTOWSKI MARK F. MULLER CONNECTICUT OFFICE WAYNE D. MEEHAN FACSIMILE (212) 425-1901 DON P. MURNANE 23 OLD KINGS HIGHWAY SOUTH THOMAS M DARIEN, CT 06820-4538 E-MAIL: reception@freehill.com THOMAS N TELEPHONE: (203) 921-1913 MICHAEL P www.freehill.com FACSIMILE (203) 358-8377 JOHN F. KAP MICHAEL E. UNGER\*

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## By Hand

The Hon. Richard M. Berman United States District Judge Southern District of New York Daniel P. Moynihan U.S. Courthouse 500 Pearl Street, Room 650 New York, NY 10007

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Richard M. Berman, U.S.D.J.

CHAMBER'S OF RICHARD M. BERMAN U.S.D.J.

Centramet Trading S.A. v. Egyptian American Steel Rolling Co. 07 CIV 6379 (RMB)

## Dear Judge Berman:

We represent Defendant Egyptian American Steel Rolling Co. ("EASROC") in this matter. We write to request that the Court waive its requirement for a pre-motion conference in connection with EASROC's application pursuant to Rule E to vacate or reduce the maritime attachment issued in favor of Plaintiff Centramet Trading S.A. ("Centramet").

Pursuant to Local Admiralty Rule E.1, EASROC is entitled to move for this relief by Order to Show Cause and to have a hearing within three court days (or as the Court may otherwise direct). Following our telephone conference with chambers late last week, we understand that the Court is available to hold a hearing with respect to EASROC's application on the afternoon of September 27, 2007.

We have conferred with counsel for Plaintiff and have agreed, should the Court consent, to the following motion schedule: Defendant's motion to be filed and served on or before September 5, 2007; Plaintiff's response to be filed and served on or before September 17, 2007; Defendant's reply to be filed and served on or before September 21, 2007.

In anticipation of the Court's consent, we enclose herewith courtesy copies of Defendants' moving papers, filed earlier today.

NYDOCS1/289554.1

The Hon. Richard M. Berman September 5, 2007 Page 2

We thank the Court for its attention to this matter and for its consideration of this application.

Respectfully submitted,

Michael E. Unger Lawrence J. Kahn

Enclosure LJK

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